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Attorneys for
GOOGLE LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO

ANIBAL RODRIGUEZ, *et al.* individually and
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF
DEFENDANT GOOGLE LLC'S MOTION
TO DISMISS THIRD AMENDED
COMPLAINT**

Date: October 28, 2021

Time: 1:30 p.m.

Place: Courtroom 3, 17th Floor

Judge: Hon. Richard Seeborg

Action Filed: 7/14/2020

Trial Date: Not Yet Set

1 I, Eduardo E. Santacana, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California. I am a
3 partner with the law firm of Willkie Farr & Gallagher LLP, counsel of record for Google LLC in
4 the above-captioned matter. I have personal knowledge of the facts set forth below and, if called
5 as a witness in a court of law, could and would testify competently thereto.

6 2. Attached hereto as **Exhibit A** is a true and correct copy of Google's Terms of
7 Service agreement in effect on March 31, 2020, which was downloaded on September 22, 2021 at:
8 <https://policies.google.com/terms?hl=en-US>

9 3. Attached hereto as **Exhibit B** is a true and correct copy of Google's Terms of
10 Service agreement in effect on October 25, 2017, which was downloaded on September 22, 2021
11 at: <https://policies.google.com/terms/archive/20171025?hl=en-US>

12 4. Attached hereto as **Exhibit C** is a true and correct copy of Google's Terms of
13 Service agreement in effect on April 14, 2014, which was downloaded on September 22, 2021 at:
14 <https://policies.google.com/terms/archive/20140414?hl=en-US>

15 I declare under penalty of perjury that the foregoing is true and correct. Executed on
16 September 22, 2021 at San Francisco, CA.

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18 By: /s/ Eduardo E. Santacana
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